

LEX TECNICA LTD  
10161 PARK RUN DRIVE, SUITE 150  
LAS VEGAS, NV 89145  
(702) 518-5535

**LEX TECNICA LTD**  
ADAM R. KNECHT, ESQ.  
Nevada Bar No. 13166  
10161 Park Run Drive, Suite 150  
Las Vegas, Nevada 89145  
adam@lextecnica.com  
*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

LEX VEST LTD, a Nevada limited liability  
company;

Plaintiff,

vs.

EMANATIONS COMMUNICATIONS  
GROUP LC, a Utah limited liability  
company; DOES 1 through 50; and ROE  
ENTITIES 51 through 100, inclusive,

Defendants.

EMANATION COMMUNICATIONS  
GROUP LC, a Utah limited liability company

Counterclaim Plaintiff,

vs.

LEX VEST LTD, a Nevada limited liability  
company,

Counterclaim Defendant.

EMANATION COMMUNICATIONS  
GROUP LC, a Utah limited liability company

Third Party Plaintiff,

vs.

LEX TECNICA LTD, a Nevada limited  
liability company; SAM CASTOR, a manager  
of LEX TECNICA LTD; ADAM KNECHT,  
a manager of LEX TECNICA LTD,

Case No.: 2:22-cv-01226-ART-BNW

**PLAINTIFF'S RESPONSE TO  
MOTION FOR JENNIFER  
KARONY TO INTERVENE [ECF  
NO. 106]**

NATHAN MORRIS, a manager of LEX  
TECNICA, LTD; and BRADEN JOHN  
KARONY, an individual and Utah resident,

Third Party Defendants.

**PLAINTIFF’S RESPONSE TO MOTION FOR JENNIFER KARONY TO INTERVENE**  
**[ECF NO. 106]**

Plaintiff, LEX VEST LTD (“Plaintiff or “Lex Vest”), hereby opposes Jennifer Karony’s Motion to Intervene (ECF 106) (the “Motion”) and submits as follows:

On Friday, May 26, 2023, Lex Vest Ltd., filed a Notice of Receivership Stay with this Court (ECF 108) giving notice that its prosecution of claims against Emanation Communications Group LC (and, if applicable, ECG Operations LC; ECG IP Holdings LC; and Emanations Energy Group LC) had been enjoined and restrained pursuant to the terms of the an Order Appointing Receiver entered on April 24, 2023, by the District Court for the Second Judicial District, State of Utah, in Case No. 220700635. A copy of the Order Appointing Receiver was attached thereto. Lex Vest further notified this Court that to the extent that Lex Vest obtains an order granting relief from injunctive provisions contained in the Order Appointing Receiver, it will provide notice thereof to the Court and all parties.

Furthermore, counsel for Lex Vest and counsel for the Receiver for Emanation Communications Group LC (“Emanation”) have met and conferred regarding Emanation’s claims against Lex Vest, and Third-Party Defendants Sam Castor, Nathan Morris, and Adam Knecht (together with Lex Vest, collectively, the “Lex Vest Parties”) in this matter. From those discussions, Emanation has agreed to dismiss all its claims against the Lex Vest Parties, *without prejudice*. Emanation is in the process of retaining new Nevada counsel to make an appearance. Once an appearance has been made, Emanation will file its dismissal of the Lex Vest Parties.

///

1 Finally, with respect to Ms. Karony's Motion, all claims she seeks to assert against the  
2 Lex Vest Parties are merely derivative of Emanation's claims it intends to dismiss in short order.  
3 In light of the Receivership Stay, Emanation's dismissal of all claims against the Lex Vest Parties  
4 (*without prejudice*), and the derivative nature of Mr. Karony's claims in intervention, the Lex  
5 Vest Parties hereby request that the Court deny the Motion as improper and moot.

6 DATED on this 31st day of May, 2023.

7  
8 **LEX TECNICA LTD**

9 

10 ADAM KNECHT, ESQ.  
11 Nevada Bar No. 13166  
12 10161 Park Run Drive, Suite 150  
13 Las Vegas, Nevada 89145  
14 *Attorneys for Plaintiff*

15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
**LEX TECNICA LTD**  
10161 PARK RUN DRIVE, SUITE 150  
LAS VEGAS, NV 89145  
(702) 518-5535

LEX TECNICA LTD  
10161 PARK RUN DRIVE, SUITE 150  
LAS VEGAS, NV 89145  
(702) 518-5535

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 31<sup>st</sup> day of May, 2023, I caused a true and correct copy of the foregoing document **PLAINTIFF'S RESPONSE TO MOTION FOR JENNIFER KARONY TO INTERVENE [ECF NO. 106]** to be served via Electronic Service and emailed to the following email address:

Gary Burnett: gary@whiteheadburnett.com, jeff@whiteheadburnett.com

Michael R. Kealy: mkealy@parsonsbehle.com, ecf@parsonsbehle.com,  
nhoy@parsonsbehle.com

Adam R Knecht: adam@lextecnica.com, amygale@lextecnica.com,  
sam@lextecnica.com, kfoster@lextecnica.com

Ashley Christine Nikkel: anikkel@parsonsbehle.com, ecf@parsonsbehle.com,  
rshaffer@parsonsbehle.com

Todd E. Zenger: tzenger@durenip.com

Glenn R. Bronson: GRBronson@traskbritt.com



An Employee of Lex Tecnica LTD